

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF MISSISSIPPI**

**IN RE RONALD JAMES STEWART AND  
CAROLYN JEAN STEWART**

**BANKRUPTCY CASE NUMBER 14-14123**

**NOTICE AND MOTION TO EXTEND OR IMPOSE THE AUTOMATIC STAY**

**COME NOW** the Debtors Ronald Stewart and Carolyn Stewart by and through the undersigned Attorney, Susan C. Smith, and file this their Notice And Motion To Extend Automatic Stay, beyond the 30 day stay as provided by section 362 (c ) (3) (B), and in support thereof would state to wit:

1.

The Debtors filed a Petition for Relief under Chapter 13 of the United States Bankruptcy Code in the United States Bankruptcy Court the Northern District of Mississippi on November 5, 2014. Debtors have filed a Chapter 13 Petition in this case which has been filed in good faith. Debtors believe that the terms of the Chapter 13 Plan will be confirmed by this Court, and will be followed in its entirety. The Debtors also believe they have sufficient income to fund the proposed plan;

2.

The Debtors in the instant case were Debtors in Bankruptcy Case Number 14-12960. That Bankruptcy Petition was withdrawn and dismissed, since the Credit Counseling Certificate had expired; and,

3.

Within the Chapter 13 Plan, Debtors intend to pay for the first and second mortgage on the property at 9042 N. Silver Brook Ln., Milwaukee, WI; a first mortgage on a property at 8445 Juanita Dr., Olive Branch, MS US Bank Home Mortgage, and a lien on a 2008 GMC Yukon owed to GM Financial.

WHEREFORE PREMISES CONSIDERED, the Debtors pray this Honorable Court will after hearing, extend or impose the automatic stay under section 362(a) as to all Creditors for the duration of this Chapter 13 proceeding, or until such time as the stay is terminated under section 362 (c) (1) or (c) (2) or a motion for relief is granted under section 362 (d) of the United States bankruptcy code and for all else deemed just and equitable by this Honorable Court.

Respectfully, submitted this the 19<sup>th</sup> day of November, 2014.

Ronald and Carolyn Stewart  
BY: /s/ Susan C. Smith  
Susan C. Smith

Of Counsel:  
/s/ Susan C. Smith  
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**CERTIFICATE OF SERVICE**

I, Susan C. Smith, Attorney for the Debtors, do hereby certify that I have this day electronically filed or mailed by US mail, postage prepaid, a true and correct copy of the Notice and Motion to Extend or Impose the Automatic Stay and the attached Declaration in Support of Motion to the following at their last known address:

BY ELECTRONIC FILING:

U. S. Trustee  
[USTPREGION05.ab.ecf@usdoj.gov](mailto:USTPREGION05.ab.ecf@usdoj.gov)

Locke D. Barkley [sbeasley@barkley13.com](mailto:sbeasley@barkley13.com)

BY US MAIL:

Ronald and Carolyn Stewart  
PO Box 868  
Olive Branch, MS 38654

And the attached list of creditors

This the 19<sup>th</sup> day of November 2014.

/s/ Susan C. Smith  
Susan C. Smith